

# **MEMO ENDORSED**

## **WL | Wright Law** ATTORNEY AT LAW

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299 BROADWAY, SUITE 708  
NEW YORK, NY 10007  
OFFICE (212) 822-1419 • FACSIMILE (212) 822-1463  
[wrightlawnyc@gmail.com](mailto:wrightlawnyc@gmail.com)  
[www.wrightlaw.nyc](http://www.wrightlaw.nyc)

November 22, 2024

**VIA ECF**

The Honorable Laura Taylor Swain  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:     *United States v. Laquan Williams (24-CR-00317(LTS)***

Dear Judge Swain:

We represent Laquan Williams and write today to respectfully request a modification of the Court's September 25, 2024 scheduling order with an expansion of the dates for motion practice. This is my first such request and it is made with the gracious consent of the government.

Discovery in this case is significant (bank records, multiple cell phones and computers) and defense counsels have been absorbing the discovery and meeting with our client at the Hudson County Jail in New Jersey to review the discovery. Additional time before the filing of motions will allow defense counsels and our client to fully digest the discovery. Furthermore, the additional time we are requesting will hopefully facilitate a plea and resolution of this case.

As a consequence, we respectfully request the following:

- the due date for motions extended from December 3, 2024 until January 20, 2024;
- a concomitant expansion of the due dates for the replies and related briefings as detailed in the Court's order dated September 25, 2024;
- and finally cancelling the December 6, 2024 conference as being obviated by the instant request.

Sincerely,  
/s/  
Christopher Wright  
/s/  
James Bell

Cc: ASUA Andrew Ken-Wei Chan and AUSA Ryan Wolfe Allison

The foregoing requests are granted. DE 19 resolved.  
SO ORDERED.

11/25/2024  
/s/ Laura Taylor Swain, Chief USDJ